#### **EXECUTIVE SUMMARY**

The State of Montana experienced presidentially-declared disasters in 2011, 2012, and 2013 involving extensive flooding and wildfire throughout the state. Since 2011, 48 of Montana's 56 counties have experienced presidentially-declared disasters, and many of these communities have struggled to rebuild and repair in a resilient fashion.

The State has identified seven sub-county areas within Montana that meet the Most Impacted and Distressed Criteria and have an eligible amount of Unmet Recovery Need (MID-URN). These sub-county areas are: Census Tracts 9405 & 9406, Big Horn County; Census Tracts 2, 9401, and 9402, Blaine County; Census Tract 301, Fergus County; Helena Valley West Central CDP, Lewis and Clark County; Census Tract 1, Musselshell County; Census Tract 2, Musselshell County; and Census Tracts 1005 & 9406, Valley County.

The intent of the state's application and use of the CDBG-NDR grant funds, if awarded, is to comprehensively and collaboratively address our primary vulnerability – barriers to communication. With this in mind, the State intends to leverage funding and resources in a technology partnership to develop an interactive, web-based platform, modeled after streamlined, accessible and user-friendly registry websites such as Etsy. This platform will provide a one-stop shop for information, identify public and private funding sources, link users to non-profit and volunteer resources, and provide a list of key projects and resiliency best practices. The State will work with MID-URN communities and identify partners to develop projects that could be added to this list and implemented. As the web platform is developed, MID-URN communities would have access to CDBG-NDR funding to complete these projects. Other communities would have access to other funding sources identified once the platform is complete.

The State envisions implementing projects in these areas that support best practices and promote outcomes that cross-cut topic areas such as housing, transportation, economy, environment and public health, and support co-benefits for the communities that choose to implement them. These projects would ideally benefit all residents within a community, including low-and-moderate income residents, small businesses, and other vulnerable populations.

The State of Montana is working with several state agencies and local partners to help facilitate this resilience initiative. Representatives from the Montana Department of Commerce, Department of Emergency Services, Department of Natural Resources and Conservation, and Department of Environmental Quality have been involved in this process and will continue to bring their expertise to the table to provide technical guidance in the resiliency planning process. Additionally, the state has partnered with all local governments in the MID-URN areas, all economic development corporations in the MID-URN areas, and multiple other non-governmental organizations. The State has sent personal letters reaching out to all of its tribal areas to participate in this process. If selected for Phase 2, the State will continue to work with and consult these organizations and others.

## THRESHOLD NARRATIVE

#### Eligible Applicant

The State of Montana is identified as an eligible applicant in the Notice of Funding Availability.

All of the identified most impacted and distressed areas with remaining unmet recovery needs are located within the State of Montana.

#### Most Impacted and Distressed Target Areas

The State of Montana has identified ten sub-county areas that meet the most impacted and most

distressed thresholds for eligibility for funding. These sub-county areas are located within

counties in the State of Montana. Their geographies are shown on Page 1 of Attachment E and

are as follows:

1. Census Tracts 9405 & 9406, Big Horn County

Declared Disaster: DR-1996 – 2011 Severe Storms and Flooding

Most Impacted Threshold Criteria: Housing

These census tracts are identified in Appendix B of the Notice of Funding Availability as

census tracts that contain an eligible amount of housing damage. Census Tract 9405

experienced damage to 128 housing units and Census Tract 9406 experienced damage to

120 housing units as a result of the DR-1996 floods.

Most Distressed Threshold Criteria: Federal Target Area or Economically Fragile Area

These census tracts are entirely located within the Crow Indian Reservation and therefore

qualify as a tribal area as defined in Appendix G of the Notice of Funding Availability.

2. Census Tracts 2, 9401, and 9402, Blaine County

Declared Disaster: DR-4127 – 2013 Flooding

• Most Impacted Threshold Criteria: Infrastructure

According to FEMA Public Assistance Claims data, \$2,640,964.22 in FEMA Category C

to Category G infrastructure damage was identified within Census Tracts 2, 9401, and

9402 as a result of the DR-4127 disaster. A list of these claims is provided at the end of

this Exhibit.

Most Distressed Threshold Criteria: Federal Target Area or Economically Fragile Area

and Area of Environmental Distress.

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The majority of the area within these census tracts is located within the Fort Belknap Indian Reservation and therefore qualifies as a tribal area according to Appendix G of the Notice of Funding Availability. The remaining portions of the census tracts contain three sites designated by the Montana Department of Quality as State Superfund Sites, including the site of the Diamond Asphalt Company, a former Blaine County Road Maintenance Shop, and the Elenberg Exploration site. A map of these environmentally distressed sites is provided on Page 2 of Attachment E.

## 3. Census Tract 301, Fergus County

Declared Disaster: DR-1996 – 2011 Severe Storms and Flooding

• Most Impacted Threshold Criteria: Infrastructure

According to FEMA Public Assistance Claims data, \$5,789,593.62 in FEMA Category C to Category G infrastructure damage was identified in rural Fergus County within Census Tract 301 as a result of the DR-1996 disaster. A list of these claims is provided at the end of this Exhibit.

• Most Distressed Threshold Criteria: Area of Environmental Distress.

Census Tract 301 contains a total of sixteen sites designated by the Montana Department of Quality as State Superfund Sites. These include the Charles M. Russell Refuge, the Deerfield Colony, the Central Montana Cooperative, the Continental Oil Refinery, the Conoco YPL, the Brewery Flats Facility, the Central Post and Treating Company, Blue Range Mining, Kendall Venture Mine, an ARCO Oil Refinery, the General Mills Denton Elevator, Strunk Mining, the site of the Stockton Oil Tanker Gasoline Spill, the Cargill General Mills Lewistown Elevator and the Cargill General Mills Danvers Elevator. A map of these environmentally distressed sites is provided on Page 3 of Attachment E.

4. Helena Valley West Central CDP, Lewis and Clark County

Declared Disaster: DR-1996 – 2011 Severe Storms and Flooding

• Most Impacted Threshold Criteria: Housing.

This census designated place was identified in Appendix B of the Notice of Funding Availability as a census area that contains an eligible amount of housing damage. The Helena Valley West Central experienced damage to 110 housing units.

• Most Distressed Threshold Criteria: Area of Environmental Distress.

The Helena Valley West Central CDP contains two sites designated by the Montana Department of Quality as State Superfund Sites. These include the Scratch Gravel Landfill and the Treasure State Acres Subdivision. A map of these environmentally distressed sites is provided on Page 4 of Attachment E.

5. Census Tract 1, Musselshell County

Declared Disaster: DR-1996 – 2011 Severe Storms and Flooding

• Most Impacted Threshold Criteria: Housing.

This census tract was identified in Appendix B of the Notice of Funding Availability as a census tract that contains an eligible amount of housing damage. Census Tract 1 experienced serious damage to 44 housing units.

• Most Distressed Threshold Criteria: Area of Environmental Distress.

Census Tract 1 contains a total of three sites designated by the Montana Department of Quality as State Superfund Sites. These include the Conoco Pipeline, Greytak Airstrip, and the Keg Coulee Injection Station. A map of these environmentally distressed sites is provided on Page 5 of Attachment E.

6. Census Tract 2, Musselshell County

Declared Disaster: DR-1996 – 2011 Severe Storms and Flooding

Most Impacted Threshold Criteria: Infrastructure

According to FEMA Public Assistance Claims data, \$3,670,498.30 in FEMA Category C

to Category G infrastructure damage was identified in rural Musselshell County within

Census Tract 2 as a result of the DR-1996 disaster. A list of these claims is provided at

the end of this Exhibit.

Most Distressed Threshold Criteria: Area of Environmental Distress.

Census Tract 2 contains a former BLM Landfill that has been designated by the Montana

Department of Environmental Quality as a State Superfund site. A map of these

environmentally distressed sites is provided on Page 6 of Attachment E.

7. Census Tracts 1005 & 9406, Valley County

Declared Disaster: DR-1996 – 2011 Severe Storms and Flooding

Most Impacted Threshold Criteria: Housing

These census tracts are identified in Appendix B of the Notice of Funding Availability as

census tracts that contain an eligible amount of housing damage. Census Tract 1005

experienced damage to 130 housing units and Census Tract 9406 experienced damage to

116 housing units as a result of the DR-1996 floods.

Most Distressed Threshold Criteria: Area of Environmental Distress.

Census Tract 301 contains a total of sixteen sites designated by the Montana Department

of Quality as State Superfund Sites. These include the Oswego Landfill, the Burlington

Northern Glasgow Facility, and the abandoned Glasgow Air Force Base. A map of these

environmentally distressed sites is provided on Page 7 of Attachment E.

Eligible Activity

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The State of Montana intends to use these funds within identified MID-URN areas by developing an interactive website platform that will leverage local, state and federal grant funds, private sources of funding and technical assistance opportunities to promote resilient projects in these areas. As projects are identified, the State of Montana is committed to spending any funds awarded on eligible activities, possibly including the acquisition of real property; public facilities; improvements to public facilities and privately-owned utilities; code enforcement; clearance, rehabilitation, reconstruction, and/or construction of buildings including housing; architectural barrier removal; loss of rental income; disposition of real property; public services; payment of the non-federal share; relocation; planning and capacity building; program administration costs; activities carried out through nonprofit development organization; economic development assistance to for profit businesses; technical assistance; housing services; assistance to institutions of higher education; microenterprise assistance; in-rem housing; and homeownership assistance in accordance with the HUD Guide to National Objectives and Eligible Activities for State CDBG Programs.

## Proposal Incorporates Resilience

As referenced in the Factor 3 narrative beginning on page x, this proposal will incorporate and promote resilience by increasing statewide communication, and identifying and implementing specific activities that increase resilience within qualifying MID-URN sub-county areas.

#### National Objective

All projects and activities identified as a result of this grant application will meet a CDBG National Objective.

#### Overall Benefit

All projects and activities identified as a result of this grant application will meet the CDBG Overall Benefit.

#### Tie-Back

All projects identified in Census Tracts 9405 & 9406, Big Horn County; Census Tract 301, Fergus County; Helena Valley West Central CDP, Lewis and Clark County; Census Tract 1, Musselshell County; Census Tract 2, Musselshell County; and Census Tracts 1005 & 9406, Valley County will be required to address unmet recovery needs identified during the DR-1996 2011 Severe Storms and Flooding disaster. All projects identified in Census Tracts 2, 9401, and 9402, in Blaine County will be required to address unmet recovery needs identified during the DR-4127 2013 Flooding Disaster.

# One Application per Applicant

This application is the only application submitted by the State of Montana.

## Certifications

Please see Attachment F.

## FACTOR 1 - PHASE 1: CAPACITY

The Montana Department of Commerce will be the primary agency responsible for implementing the proposed activities. The Department currently administers all of the state's Community Development Block Grant funds, in addition to other HUD programs such as HOME and Section 8. The department also oversees other infrastructure related planning and project grant programs such as the Treasure State Endowment Program and the Montana Quality Schools Grant Program.

The Department of Commerce has worked closely preparing this application with the Disaster and Emergency Services Division of the Montana Department of Military Affairs (DES), the Montana Department of Environmental Quality (DEQ), and the Montana Department of Natural Resources and Conservation (DNRC). The Montana Department of Commerce runs the state Community Technical Assistance Program, which provides community land use planning guidance to counties and municipalities across the state. Additionally, the department oversees multiple planning and infrastructure related grant programs and has expertise in grant management and administration, managing on average \$25 million in state and federal funds annually. The Montana DES has expertise in disaster recovery and runs the state Hazard Mitigation Grant Program, coordinates local emergency services coordinators, and led the development of Pre-Disaster Mitigation Plans for communities across the state. The Montana DEQ oversees the State Superfund and Brownfields programs, assists with environmental cleanup and mitigation along Montana's major river corridors, and maintains information regarding hazardous chemical stocks within the state. The Montana DNRC provides expertise in floodplain and floodplain management, hydrology, forestry, and wildfire management. All of these agencies and disciplines will coordinate in the selection and implementation of projects and activities under the scope of this grant award. Outside of state government, regional economic development corporations such as Bear Paw Economic Development Corporation, Great Northern Economic Development Corporation, Snowy Mountain Development Corporation, and the Montana Business Assistance Connection will serve as partners to help identify community needs as they pertain to economic development. Local municipalities and counties that are in identified areas that meet the MID-URN thresholds are also identified as partners. These partners

will be invaluable in contributing local knowledge, facilitating public participation, and helping to ensure that implemented resilient projects are maintained and expanded upon over time.

These communities and departments routinely work together on a variety of projects. Within Montana's Emergency Response Framework, state agencies are assigned emergency response roles described as Essential Support Functions. If called upon to assist in a local emergency, the agencies implement response plans according to those assignments. Following a disaster, the state DES works closely with the state DNRC and state DEQ in order to ensure that implemented response and mitigation measures are effective and contribute to the resiliency of communities. There is also solicitation and coordination between these agencies prior to a disaster occurring, and when planning and implementing mitigation projects. Regional Economic Development Corporations work closely with the Department of Commerce in implementing local economic development strategies and act as a liaison between the state department and local governments and business owners. The state Department of Commerce routinely works with the state DNRC and DEQ in funding large scale public infrastructure projects such as water and wastewater treatment facilities.

The state has extensive experience with comprehensive planning. The Montana Department of Commerce runs the Community Technical Assistance Program (CTAP), which provides land use and planning guidance to all municipalities across the state. This program seeks to establish and encourage best planning practices and awards funds for comprehensive planning through several different grant programs including the Community Development Block Grant program, the Montana Main Street Program, the Treasure State Endowment Program, and the Montana Quality Schools program. These grant programs frequently fund the development of growth policy plans (comprehensive plans), capital improvements plans, downtown master

plans, and housing plans. CTAP is actively involved in planning at the local level and has attended public meetings at the local level, hosted workshops, and provided guidance on local planning efforts. Additionally, the Department of Commerce oversees the development of large scale water, wastewater, stormwater, and bridge infrastructure projects through the Treasure State Endowment Program.

The state agencies identified as major partners have employed professionals that specialize in community planning, public outreach, disaster recovery, economic development, floodplain management, civil engineering, hydrology, forestry, wildfire management, environmental cleanup, hazardous materials management, and grant administration. These agencies and persons will help to identify projects and activities that will best encourage and enhance community resiliency. Once projects are identified, contractors will be identified and procured that can help with the construction or implementation of projects in eligible communities across the state.

Given the diverse nature and talent of the state agencies working on this program, the state will be able to take a comprehensive approach in analyzing the risks, benefits, and outcomes of any proposed project. This will ensure that implemented projects increase community resilience in a way that is sustainable in the long-term with minimal risk. The state will consider climate change related risks as part of pre-disaster mitigation plans at the state and local level, relying on the expertise of hydrologists, wildfire specialists, civil engineers, and flood mitigation experts that already exist within state agencies to assess whether projects adequately address the threat of climate change. Montana is already experiencing the effects climate change in that our forests have been severely impacted by the spread of the mountain pine beetle, causing loss of trees, higher burn risk while the trees are standing and loss of slope

stability after a forest fire. Many Montana counties are offering financial assistance to landowners needing to mitigate the loss of trees. Additionally, as storm patterns are modified with climate change, runoff patterns are expected to be affected and infrastructure may not be large enough to safely handle increased runoff resulting from the changes.

The Montana Department of Commerce oversees all state grant programs that are funded by the U.S. Department of Housing and Urban Development, including the Community Development Block Grant Program. This requires the Department to periodically investigate civil rights and fair housing issues. The Department of Commerce houses the state Census and Economic Information Center, which possesses the capacity to analyze racial and economic disparity using data from all state and federal sources.

As indicated above, the state is involving many agencies in the implementation of this grant. These agencies bring a broad base of expertise and decades of experience and local familiarity to the table. The State will rely on the professional judgment of those with the appropriate expertise to ensure that design quality is high and that long-term resilience is enhanced. The State will expect local government and economic development corporations, as partners, to assist with local level public outreach and initial identification of projects, to ensure that any activities implemented not only further the goal of increasing resilience, but also meet local needs and desires.

As the State of Montana is the primary applicant, as opposed to any specific department, it is highly unlikely that any state agency would drop out. However, should this occur, the state would contract out for services to acquire the technical expertise that any particular state agency would have been able to provide. If a local government or regional economic development corporation were to choose not to participate, the State has the capacity to perform the local level

public outreach and research that those partners would have been expected to handle. However, the State would greatly prefer to have local governments and economic development corporations involved as much as possible, since these agencies would be impacted by investments in their communities and would likely be responsible for long-term upkeep of any activities implemented.

The state uses a cost-benefit analysis methodology in the ranking of infrastructure project grant applications for the Treasure State Endowment Program within the Montana Department of Commerce. One of this program's ranking priorities weighs the cost of construction against the community's ability to pay for the project. Other ranking criteria considered evaluate the urgent public health and safety need and the engineering feasibility of the project. Professional engineers review the application materials submitted and make this determination based on preliminary engineering work performed and known best practices. The sum of these scores, in addition to other priorities, determines the final ranking of each project. This ensures that the projects that are most financially viable and provide the greatest benefit are most likely to be funded. A similar methodology could be used in ranking and determining overall resiliency. The state could evaluate proposed projects based on the amount of resilient benefit they provide, consulting our diverse team of partners, and then weigh the cost and financial need of the community to determine if a specific project should be funded.

Local governments and regional housing and economic development corporations have the greatest capacity to engage local and regional stakeholders, as these agencies and organizations work closely with local residents and business owners. As Montana is a rural state, these local and regional partners will often be personally acquainted with a large portion of an area's population and have the ability to most effectively coordinate and advertise for stakeholder input. In the most urban sub-county area identified, the Helena Valley West Central CDP, the State has also partnered with the citizen-led Helena Flood Committee that has been active in engaging landowners in the area in flood mitigation planning for several years. The state anticipates working with local governments to identify the best approach to increase community resiliency in each sub-county area. Feedback from citizens and advisory committees will be accepted and taken into consideration as long as it furthers community-wide resiliency efforts.

The State has worked extensively with local governments in disaster recovery. The State DES facilitates the dispersal of recovery aid after all Presidentially-Declared Disasters in tandem with local governments. Additionally, the state DES agency provides oversight to local DES coordinators outside of declared disasters for information sharing, disaster response planning and mutual aid.

Outside of disaster recovery, the state strives to empower local leaders in the implementation of local goals and objectives. The state Department of Commerce works closely with local governments in the administration of Community Development Block Grants, Treasure State Endowment Program grants, and other grant funding pools. Local governments are typically responsible for developing their vision for possible projects, procuring consultants and engineers, and administering these grant projects. The state provides funding and oversight to ensure that quality projects are produced and that state and federal regulations are followed. The Community Technical Assistance Program within the Department of Commerce provides technical assistance to local governments in the development and adoption of planning documents to provide these communities with the tools they need in order to seek project funding and private investment.

The state Department of Natural Resources and Conservation has worked to address regional problems related to flooding and fire; specifically, commissioning studies along entire river corridors to assess water and flooding related issues. Together, the Department of Environmental Quality and the Department of Natural Resources and Conservation provide grants to local governments for water and wastewater system improvements through the State Revolving Fund Programs. The Department of Environmental Quality has been involved in the management of all of the state and federal superfund sites in the state. These sites often cross county lines and require a regional approach in their cleanup and abatement. The Department of Commerce is responsible for developing a state-wide consolidated housing plan for HUD and administers state-wide housing programs to address regional housing problems.

The threats identified in this application extend beyond the identified sub-county areas. Forty-eight of Montana's 56 counties experienced a Presidentially-Declared Disaster in 2011, 2012, or 2013. The state's proposed solution will take a state-wide approach to community resilience efforts. While CDBG-NDR funds will only be expended in identified sub-county areas, the state's resiliency framework will be accessible to the entire state with the goal of increasing awareness of resiliency issues and providing ideas for projects that could be implemented with other funding sources to increase community resiliency. One of the focuses of the state's proposed resiliency platform is to provide equal access to those across the state, improving communication and giving vulnerable populations more ability to access and use resources. By improving communication and more clearly defining and publicizing available resources and best practices, vulnerable populations will have more opportunity to be empowered to improve their own communities. Given the dispersed nature of the state's population centers, it is unlikely that local solutions would negatively affect other areas, but the

possibility of this issue arising will be addressed prior to the implementation of any project. Particularly, the Department of Environmental Quality's work with local watershed groups would allow for early conversations about physical impacts of any infrastructure resiliency measures.

The state will use the existing framework in place that it used to develop the initial application process in the selection of projects. Members of the state Department of Commerce, Department of Emergency Services, Department of Natural Resources and Conservation, and Department of Environmental Quality (comprising the State of Montana Resiliency Working Group) will work together on the development of the interactive website platform [discussed in greater detail in Factor 3, beginning on page #] and the identification and implementation of specific project activities. Local governments will be involved in the identification of activities in their areas, public outreach and administration.

## FACTOR 2- PHASE 1: NEED AND EXTENT OF PROBLEM

The State of Montana has identified ten sub-county areas that demonstrate the Most Impacted and Distressed Thresholds and have a sufficient amount of unmet recovery need to meet grant requirements. A map of these sub-county areas is located on Page 1 of Attachment E. These areas are identified as follows:

#### 1. Census Tracts 9405 & 9406, Big Horn County

This portion of Big Horn County is located entirely within the Crow Indian Reservation in south-central Montana and includes the communities of Pryor, St. Xavier, Crow Agency, and Lodge Grass, which comprise the majority of the population on this reservation. As noted in the threshold narrative, this tribal community experienced damage to 248 housing units during

the DR-1996 2011 Severe Storms and Flooding disaster, qualifying the area as most impacted. As these census tracts are entirely contiguous with the Crow Indian Reservation, the area qualifies as most distressed. In February of 2015, tribal leaders conducted a windshield survey of the affected area to identify homes that still had remaining unmet recovery need. In this survey 20 homes were identified as having remaining need. Given a lack of tribal resources to commit to a comprehensive windshield survey of the entire affected area, it is likely that many more homes remain with significant damage. Many of these homes are old settlement homes built inexpensively by the federal government in the 1920s and 1930s that are in barely habitable (although in actuality, are inhabited) condition and lack a clear chain of ownership, making it impossible for FEMA to provide Individual Assistance to these residents.

# 2. Census Tracts 2, 9401, and 9402, Blaine County

This portion of Blaine County contains the entire Fort Belknap Indian Reservation in north central Montana and includes the communities of Hays, Lodgepole, and Fort Belknap Agency. As noted in the threshold narrative, the affected census tracts experienced \$2,640,964.22 in eligible infrastructure damage due to the DR-4127 2013 Flooding disaster, including \$2.5 million in damage to county and reservation roads and bridges. Much of this infrastructure was repaired by FEMA, but there is remaining unmet recovery need in housing as the community lacks the resources to fully recover from the housing issues, qualifying the area as most impacted. Additionally, while much of this census area is located within the Fort Belknap Reservation and qualifies as most distressed, other portions of the county contain State Superfund Sites to qualify those areas as most distressed. In February of 2015, tribal leaders conducted a windshield survey of the affected area to identify homes, primarily in the

Hays and Lodgepole areas, that still had remaining unmet recovery need. In this survey XX homes were identified as having remaining need.

## 3. Census Tract 301, Fergus County

This portion of Fergus County contains the majority of Fergus County located outside of the City of Lewistown, including the towns of Winifred, Moore, and Grass Range. As noted in the threshold narrative, during the DR-1996 2011 Severe Storms and Flooding disaster, this rural area experienced \$5,789,593.62 in eligible infrastructure damage, primarily affecting county roads, bridges, and rail infrastructure. The extent of this damage qualifies the area as most impacted. Additionally, rural Fergus County contains three State Superfund sites including former mining facilities and the site of an oil spill. Fergus County's unmet recovery needs primarily lie in infrastructure. In August of 2013, TD&H Engineering completed a Preliminary Engineering Report for the Ross Fork Rail Trestle to estimate the costs of repairing damage caused to this rail link. This document clearly indicates that the damage was caused by the DR-1996 Severe Storms and Flooding Disaster in 2011 and estimates a cost of \$1,133,110 to repair the flood related damage to this bridge. At this time, funding has not been secured for these repairs as rail trestles generally fall outside of the scope of state grant programs. A sources and uses statement along with the Preliminary Engineering Report are included as part of this grant application and can be found at the following location [insert drop box web link].

## 4. Helena Valley West Central CDP, Lewis and Clark County

The Helena Valley West Central Census Designated Place is located just north of the state capital of Helena, Montana and comprises a substantial portion of the residential housing in the Helena area. As noted in the threshold narrative, this area experienced damage to 110

housing units during the DR-1996 2011 Severe Storms and Flooding disaster, qualifying the area as most impacted. Additionally, the area has two designated State Superfund sites which qualify the area as most distressed. Many of these homes experienced mold damage that developed as a direct result of the 2011 flooding season, and others have remaining structural damage in their basements. The residents of this area have been proactive in attempting to improve their resilience, forming a citizen-led Valley Flood Committee and working closely with Lewis and Clark County to develop a Flood Mitigation Master Plan for the area, which was adopted in April 2013. However, the community has to date lacked the funds to fully implement these planning efforts to increase their resilience and ability to recover from future disasters. In February 2015, members of the Valley Flood Committee completed a windshield survey of their remaining unmet recovery needs under the guidance of the Lewis and Clark County Department of Emergency Services. This windshield survey identified 20 homes as having remaining unmet recovery need.

### 5. Census Tract 1, Musselshell County

This portion of Musselshell County is primarily located outside of the town of Roundup, Montana and comprises much of the rural area in Montana. While this area is fairly sparsely populated, many of the homes are located along the Musselshell River and were heavily damaged during the 2011 flooding season. As noted in the threshold narrative, during the DR-1996 2011 Severe Storms and Flooding Disaster, the community experienced serious damage to 44 housing units, qualifying the area as most impacted. Additionally, the area contains three identified State Superfund Sites that are primarily the result of oil and gas spills throughout the area, qualifying the area as most distressed. In February 2015, the Musselshell County

Department of Emergency Services Coordinator conducted a windshield survey and identified XX homes with remaining unmet recovery need.

## 6. Census Tract 2, Musselshell County

This portion of Musselshell County is primarily located within the town of Roundup, Montana and has been among the hardest hit communities by disaster in recent years. As noted in the threshold narrative, during the DR-1996 2011 Severe Storms and Flooding Disaster, the community experienced \$3,670,498.30 in eligible infrastructure damage, primarily affecting city roads and bridges. The extent of this damage qualifies the area as most impacted. Additionally, the area is qualified as meeting the most distressed threshold as it contains an abandoned landfill that is being actively managed as a State Superfund Site. Much of the remaining unmet recovery need in Roundup relates to housing. In February 2015, the Mayor of Roundup and the Musselshell County Department of Emergency Services Coordinator conducted a windshield survey and identified XX homes with remaining unmet recovery need. This community has been particularly resilient through these last few years and has developed a local Red Cross-type volunteer organization that helps to provide and inventory supplies including food and medicine in the event of disaster.

# 7. Census Tracts 1005 & 9406, Valley County

This portion of Valley County contains the Towns of Glasgow, Fort Peck, and Nashua as well as the southeast portion of the rural county, including areas within the Fort Peck Indian Reservation. As noted in the threshold narrative, during the DR-1996 2011 Severe Storms and Flooding Disaster, the community experienced damage to 246 housing units, qualifying the area as most impacted. Additionally, the area is qualified as meeting the most distressed threshold as it contains sixteen different State Superfund sites, including the abandoned

Glasgow Air Force Base and a former Burlington Northern Rail servicing facility. The city of Glasgow has been proactive in attempting to increase resilience, having formed a citizen-led Glasgow Levee Committee to attempt to resolve issues with the community's levee system. In February 2015, the Valley County Department of Emergency Services Coordinator conducted a windshield survey and identified 20 homes with remaining unmet recovery need.

The State of Montana has identified these areas as the areas that meet the most impacted and distressed and unmet recovery needs thresholds. All of these areas experienced considerable infrastructure and housing loss relative to the low populations of Montana's rural counties and meet the threshold requirement for either infrastructure or housing related criteria.

In evaluating recovery options, the State of Montana will take a comprehensive risk approach to inform the development of proposed projects. As described in Factor 3, the intent of this grant application is to develop a resource sharing platform intended for the whole state to identify funding to increase and develop resiliency as well as provide opportunities for knowledge and resource sharing between jurisdictions. Of the funding opportunities envisioned within this statewide resource, CDBG-NDR funds will only be made available for those communities that HUD has determined through this application process to meet the MID-URN thresholds. Other communities with resilient project ideas would have access to a mix of public and private funds outside of the CDBG-NDR program. The state envisions awarding funds to those communities that best demonstrate a resilient approach to address their remaining unmet recovery needs as they are identified within this grant application.

Given that 48 of Montana's 56 counties experienced a presidentially declared disaster in the years 2011, 2012, and 2013, with 11 of those counties experiencing disasters in multiple

years, it is prudent to take a statewide approach to identifying risks and opportunities to increase statewide resilience. Montana's location along the Continental Divide at the headwaters of both the Columbia and Missouri Rivers makes it particularly prone to natural disasters such as large wildfires and flooding.

As Montana is the 4<sup>th</sup> largest state in the Union and has the 48<sup>th</sup> lowest population density, many of its populated areas are a great distance from each other, making communication and evacuation in the event of a disaster a major vulnerability. The State is currently active in physically mitigating damage before it occurs. The State manages the hazard mitigation grant program and the flood mitigation assistance programs. The HMGP is technically a post disaster grant but the concept behind it is supports mitigation to reduce or lessen the impact of a disaster during the next event. The State also manages a Pre-Disaster Mitigation (PDM) grant program that helps communities implement projects to minimize the physical damage that will occur if disaster strikes. Through PDM planning, jursidictions are encouraged to update their local plans at regular intervals and incorporate comprehensive studies to inform their approach to mitigation. Additionally, the DNRC works directly with FEMA on floodplain studies within their risk map program, to encourage resiliency in each jurisdiction. However, the state could improve the existing framework in place to promote non-physical measures that go beyond mitigation to increase community resiliency.

The 2011 flooding season affected 45 of Montana's 56 counties. According to the U.S. National Climate Assessment, Montana is expected to continue to experience rising temperatures. This will lead to more rapid snowmelt, which will continue to cause events similar to the 2011 flooding season in the future. Additionally, as temperatures rise and population increases, there will be increased demand for water. In Montana and the rest of the arid west, this

limits the ability to continue agricultural development, and likely will make the area more prone to wildfire. As extreme weather events become more frequent, the likelihood of disaster compounded by other disasters increases. For instance, a strong wildfire season can cause considerable erosion around streams and banks and change the composition of soil to make it less able to absorb water, making these areas more prone to flooding. Additionally, Montana has experienced two major crude oil pipeline breaks into the Yellowstone River in less than four years. The active nature of Montana's headwater rivers places downstream states and amenities at risk each time river scouring affects a pipeline. Following the 2011 Silvertip pipeline break during flood conditions, the federal Pipeline and Hazardous Materials Safety Administration inspected pipeline crossings in Montana over 100 feet in length and ordered numerous corrective measures. Because of these issues, Montana envisions including the entire state in its overall resiliency framework, as every county within the state has proven to be prone to flooding, wildfire, or man-made disaster.

Given the state's rural population and large geographic area, many of our local governments have limited resources for data collection. Typically, these governments rely on planning grant funds from various state agencies to help conduct the background research and develop these documents. Despite this shortfall in resources, every county and many tribal governments in Montana have adopted Pre-Disaster Mitigation Plans to help identify potential hazards and identify possible solutions to these problems. Additionally, many communities across the state have developed Community Wildfire Protection Plans that outline desired policies to minimize fire risk within communities. These plans represent the best available data for identifying risks and vulnerabilities within Montana counties. In most cases, these documents

assess historic risks and their impacts at the local level and identify potential areas for hazard mitigation.

Additionally, local planning documents such as growth policies (comprehensive plans), capital improvements plans, and engineering reports for infrastructure can be an invaluable resource to identifying areas to improve and increase community resilience. Many communities, such as the Helena Valley and Glasgow, have developed citizen-led committees to help manage limited resources to focus on single issues such as flood mitigation and levee repair that can help to promote resiliency.

The State will partially rely on these agencies and efforts to identify areas that can be used to increase and promote resiliency, as local governments and local disaster mitigation plans typically have the best ability to identify the effects of disasters. However, as these efforts are usually very focused on evacuation, structural recovery, and the effects of specific disasters, the state will be responsible for identifying the cause of disasters and how these efforts fit into a larger framework of statewide resiliency.

Improved interagency communication at the state level and better access to statewide resources at the local level will help communities to more proactively identify specific needs before a disaster occurs. After a disaster occurs, increased communication will allow for faster response and better organization during the recovery process, as available resources will already be coordinated. This will minimize the amount of time it takes to activate and deploy these resources and ensure that communities receive all available assistance as quickly as possible.

Access to and involvement in the development of an interactive website platform for information sharing and funding opportunities will also directly address unmet recovery needs by providing aid for direct, resilient repair of damages that arose from the disasters in 2011 and

2013. The state intends to award CDBG-NDR funds to those local governments that address the unmet recovery needs outlined in this grant application. This could involve flood mitigation efforts, such as those identified in the 2013 Helena Valley Flood Mitigation Master Plan, that would protect the local housing stock and make communities more resilient to future disasters.

Montana's tribal population is uniquely at risk. The Fort Belknap and Crow Reservations are both located within most impacted and distressed areas. These communities have been heavily impacted by damage caused by their proximity to the Milk and Bighorn Rivers. Additionally, six of Montana's seven tribal reservations were located in areas declared by presidential disaster during the 2011, 2012, or 2013 flood and fire seasons. These tribal areas tend to have unique challenges. Many of the homes occupied within these reservations are tribal-owned settlement houses from the 1920s and 1930s that lack a clear chain of ownership and are therefore ineligible for flood insurance or other measures that can help their communities recover in the event of disaster.

Due to the isolated, rural nature of Montana's population, those with accessibility challenges are at great risk in the event that they need to be evacuated during a disaster. For instance, a wildfire event in a rural area could require citizens to evacuate their homes in a timely fashion. Improving communication will help these individuals to more quickly and effectively be notified of impending disaster and can assist in their evacuation. For instance, a local law enforcement agency could maintain a list of those that need extra assistance in the event of disaster, and could allocate resources towards these persons as soon as possible. A reverse 9-1-1 system could also aid in the evacuation of those with accessibility challenges by providing additional means of communication to alert them of impending disaster.

According to the Montana Census and Economic Information Center, the population of Montana is expected to grow by about twenty percent in the next 45 years. This population growth is primarily expected to occur in two different portions of the state. The mountainous region in the western portion of the state that is particularly prone to wildfires and issues within the wildland-urban interface is expected to continue growing for the foreseeable future. Additionally, the resource-rich areas of the eastern part of the state are also expected to experience considerable population growth.

However, much of the central portion of the state is expected to lose population. Of the eight counties identified that contain identified target areas, three are expected to shrink. Big Horn County, which contains the Crow Reservation, is expected to lose a full 41% of its population by 2060. Musselshell County is expected to lose 11% of its population. In part because of these disasters, people are choosing to abandon these communities to move to larger population centers. This population loss presents a significant vulnerability to these communities that will make it more difficult for them to resiliently recover from disasters in the future. With a diminished tax base, these communities will have less local support and will be more reliant on outside agencies to assist them with their disaster recovery. Increased community resiliency will help to make these communities more appealing for those that live within them, and help to encourage people to continue to live and do business in these areas.

As demonstrated by the number of identified areas with a State Superfund site in the most impacted and distressed threshold response, much of the state of Montana is actively engaged in resource development. This includes mining and oil and gas production and the cleanup associated with these sites once they are decommissioned. While these activities are an economic boon for the state of Montana, they also carry with them great risk of disaster. If a flood event

caused damage to an oil pipeline river crossing, for instance, the results could be devastating. According to the U.S. Department of Transportation Pipeline and Hazardous Materials Safety Administration, there have been 38 significant pipeline incidents in the state since 1995, resulting in \$159,822,695 in direct property damage and lost oil and natural gas. The indirect environmental cost of these pipeline incidents is likely much higher. For instance, the total cleanup cost of the 2011 ExxonMobil Silvertip crude oil pipeline spill into the Yellowstone River was estimated at \$135 million.

The state of Montana has been proactive in implementing flood and fire mitigation projects, seismic mitigation, planning, public education and outreach as resources allow. Additionally, the state actively manages grant programs for hazard mitigation, pre-disaster mitigation and flooding assistance which help to improve community resiliency by implementing physical measures to make disaster less likely to re-occur. However, the state has thus far been very focused on physical mitigation measures and is only beginning to take a comprehensive resilience-based approach to identifying projects to improve communities.

At the state level, Montana has addressed some risks through the adoption of a reporting system called EPLAN for facilities containing hazardous materials over a set threshold as required by the FEDS, the federal threshold for reporting. This online system is a requirement of EPCRA. The data is made readily available to first responders through a login to the database that identifies the chemicals, marks the site and its proximity to a school or hospital and contains a site map so that first responders may see what they are entering when an emergency happens. The Department of Environmental Quality, responsible for responding to hazardous materials emergency incidents when called upon, is also using this information to assess risks to intakes for public water supplies. While many local response entities still need to be trained and have

access, the effort is moving forward. The DES administers a grant on behalf of the Department of Transportation to train and prepare for transportation related incidents involving hazardous materials. Additionally, PDM plans address hazardous chemicals as well as in the THIRA (threat hazard identification risk assessment) at the local level.

#### FACTOR 3 – PHASE I: SOUNDNESS OF APPROACH

## Consultation

Barriers to communication due in large part to the expansive geography in the state of Montana, the divide between urban and rural populations, and the divide between tribal and non-tribal governments, elevates the importance of outreach and communication as part of the state's application for NDR funding. The approach to date – since the NOFA was introduced back in September 2014 – has been a combination of letters, email, press releases, partner/stakeholder one-on-one meetings, larger coordination meetings and conference calls, public meetings and conference calls, website updates, social media and coordination with agencies, departments, divisions and organizations during their regularly scheduled meetings to provide information and gain input on the state's application for NDR funding.

The plan for continued collaboration, outreach and communication would include all of the avenues listed above, with a greater focus placed on frequent project coordination meetings, made open to the public but specifically including project stakeholders and partners key in the development of our Phase 2 project application and continued refinement of the state's approach. The state would continue to advertise these meetings using the EMMA email list serve that was developed for the purposes of the NDR grant process, in conjunction with updates to the CDBG-NDR website the state developed and has linked to the Department of Commerce Community

Development Division main frame, and also linked directly to the Governor's Office web page. Continued social media outreach through Twitter and Facebook would be utilized. Personal letters to key stakeholders, including tribal governments and vulnerable populations, would be used to encourage and inform their direct participation in the development of Phase 2 of the application process. Meetings would be held at recurring intervals – every month at a minimum – and made available to participants in person and via teleconference. This, in addition to continued direct outreach with individual stakeholders and partners to discuss elements of the application and approach specific to their needs, would ensure lines of communication remain open throughout the process, and that input received could be successfully integrated into the development of Phase 2 of the state's application.

Upon initiating efforts to complete the CDBG-NDR Phase 1 application, the state identified a team of agency leaders to head up project development, stakeholder engagement and compilation of this application. The team includes representatives from the Department of Commerce, Department of Environmental Quality, Department of Emergency Services and Department of Natural Resources and Conservation. Each of these Departments has been represented in ongoing communication in the development of this Phase 1 application, and had representation at the Resiliency Academy held in Seattle January 21<sup>st</sup> -23<sup>rd</sup>, 2015.

Additionally, the state recognizes the sub-county areas identified by the MIDURN checklist [reference Section/page #] as meeting the threshold requirements as key stakeholders in the project implementation, should the state receive funding. As the state worked toward the identification of areas meeting the MIDURN threshold requirements, stakeholders in communities impacted by disaster statewide were invited to participate in a series of meetings; the first held on December 17<sup>th</sup>, 2014, the second on January 9<sup>th</sup>, 2015 and the 3<sup>rd</sup> on February

25<sup>th</sup>, 2015. In addition to identifying the MIDURN communities that would be the focus of this application, these meetings served as an opportunity to engage other local, regional and statewide stakeholders, discuss unmet needs and desired solutions, brainstorm resilient solutions, and begin to identify potential partnerships as the project moved forward.

Ongoing coordination with stakeholders will become even more important as the project moves forward through Phase 2. State agency stakeholders have been integral in the framing and development of the state's approach [discussed in greater detail below in Section 3.b, page #]. However, the local stakeholders identified as communities meeting the MIDURN threshold requirements will be integral in the development of resilient solutions to implement in order to address continued unmet needs specific to their circumstance. Their participation in the continued group meetings will be essential, to further develop the resiliency best practices that will be deployed in their communities. The state will seek to utilize their ability to reach out to their constituents at the local level, and collect their ideas, concerns, and goals for resiliency to bring to the larger table for discussion and further development. Use of surveys – both online and in person – may be a tool to collect and share this type of information via the identified stakeholders. Involving our identified partners in the ongoing conversations related to resilient solutions will also be key, to provide technical expertise and insight on the reality of implementation, offer support through use of their professional resources and personnel, and contribute in the development of best practices and resilient solutions that can be applied in MIDURN communities, then further expanded and emulated statewide. Combining all three levels of stakeholder – state agency, MIDURN communities, and our public & private partners – will ensure a collaborative process is followed and successful outcomes are reached.

As discussed above [page #], when the state began this process the outreach to potential stakeholders and partners was far-reaching. This broad-based approach to communication and outreach happened for two reasons. Initially the state did not know which sub-county areas were going to be capable of meeting the threshold requirements set by HUD, therefore a concerted effort was made to gather as much information and inform as much of the population as possible, to determine which jurisdictions in what areas were going to qualify under the requirements of this grant. The second reason for this expansive outreach was to ensure broad awareness of the grant opportunity. The greater the awareness, the greater the likelihood that vulnerable populations would be informed and represented throughout the process. This approach has led to involvement and partnership in the development of the state's Phase 1 application by regional housing and economic development authorities along with regional community development organizations, tribal governments, conservation organizations, local disaster and emergency service coordinators, volunteer groups, local governments and grant coordinators, and many more [reference Consultation Summary in Attachment I].

A considerable effort was made to reach out directly, and repeatedly, to tribal governments – especially those in areas that have experienced a disaster during the 2011, 2012 and 2013 timeframes, and continue to struggle to address unmet need. Emails were sent to tribal chairmen/presidents, as well as the disaster and emergency service (DES) coordinators serving the tribes in those regions. Emails were followed by direct outreach via phone. Outreach efforts have been led by the Governor's Office of Indian Affairs, supported by Department of Commerce representatives in the Indian Economic Development Program and State Tribal Economic Development Commission. Personal letters directly from Governor Bullock inviting tribal participation in the development of the state's Phase 1 application were sent to each tribal

chairmen/president. Coordination with regional organizations supporting tribal governments in addressing unmet need has been prioritized, particularly in those tribal areas meeting the MIDURN threshold requirements, which includes portions of the Crow Indian Reservation and Fort Belknap Indian Reservation. With this concerted effort, both the Crow and Fort Belknap Reservations successfully completed and submitted windshield surveys documenting ongoing unmet need. The state will seek continued partnerships with these and other tribal entities moving forward in Phase 2 of the application process. The state will also seek to engage stakeholders in other vulnerable population groups, such as the elderly, through coordination with AARP and regional housing agencies.

Coordination with stakeholders and the development of key partnerships over the last five months has resulted in a very clear understanding of how the risk of flood, fire, severe storms and drought (most prevalent but not limited to) are compounded by the communication barriers prevalent in Montana – both geographic and political. Coordination to date has been driven by discussion of these cumulative impacts, and the best way to address them. However, the indirect risks and vulnerabilities associated with environmental contamination and the impact this would have on target communities identified and the state as a whole has only recently come to light, as a result of the second oil spill along the Yellowstone River in January which seriously threatened a city drinking water supply (note, as the spilled oil is under the ice, the threat continues until after ice breakup). These indirect risks and their cumulative impacts will continue to be discussed and fleshed out further in the state's Phase 2 application, as this type of disaster and the impact to public health and safety as a result of contamination remains a growing concern.

The extensive collaboration the state has completed to date, involving stakeholders, project partners, and private citizens has helped to formulate this Phase 1 proposal; refer to the

Consultation Summary Form attached for further details on who has been involved in this consultation process and their contribution to date [reference attachment location].

## b. Idea(s) or Concept(s)

The state of Montana plans to address identified unmet needs in the sub-county areas in focus [reference threshold narrative on page #] by developing a comprehensive, state-wide approach to resiliency that will focus on removing barriers to communication in how communities prepare for and respond to disasters, while seeking opportunities to connect dispersed populations and varied geographies of the state in supporting local efforts to build resiliency from the ground up. This concept to further resiliency in both the sub-county areas of focus as well as statewide will be implemented through the establishment of a platform to improve social cohesion that will empower local and tribal jurisdictions to take responsibility for implementing resilient strategies in their own communities.

First, the state will leverage funding and resources in a technology partnership to develop an interactive, web-based platform, modeled after the streamlined, accessible and user-friendly registry websites such as Etsy. The purpose of the interactive platform is multi-faceted; it would provide a one-stop-shop for information sharing between local, tribal, state and federal governments, identify public and private funding sources to build a diverse funding package for project implementation; link users to non-profit and volunteer resources that would support capacity building efforts within the community and could also serve as part of a project funding package, contributing to implementation of the project and potentially helping to offset costs. Most importantly, the interactive web portal would provide a bucket list of key projects and resiliency best practices, developed in partnership with representatives from the MIDURN communities [reference checklist] but also in coordination with state partners at the Departments

of Commerce, Environmental Quality, Natural Resources and Conservation, and Disaster and Emergency Services Division at Department of Military Affairs. Additionally, the development of these key projects will include significant input from, and continued consultation with, our established public and private partners that have been actively involved in the grant application development process to date [reference Consultation Summary in Attachment I and Partnership Letters provided in Attachment C]. This project list would focus on activities that promote best practices in resiliency before a disaster occurs, while responding to continued unmet needs that exist in MIDURN communities in a manner that supports a resilient response. Depending on the needs of the community and discussion/collaboration amongst partners, projects may include property acquisition and relocation programs; broadband expansion to support technology improvements such as reverse 911 notification, interactive mapping and projection analysis for cities and counties to determine areas within their jurisdictions most susceptible to fires, flooding, drought and severe storm impacts; green infrastructure technology improvements such as natural flood control devices; alternative construction techniques for homes, business and infrastructure; and many more. The key project list could also include an option for local governments to apply for funding to complete a project unique to their jurisdiction, when supported by comprehensive local planning efforts and clearly supporting future resiliency within the community. This would give the state flexibility in funding projects that would serve as models for other communities in similar situations, but that may be too unique for inclusion on a more generalized project list.

At this time, the project list is theoretical; the state will consider various alternatives and suggestions to potential projects, and commits to engaging partners in the development of this list during Phase 2 of this application process. However, the state is committed to the

development of the interactive web-based platform as the mechanism to address the existing vulnerability in communication statewide. By developing a functional tool that links local governments with funding opportunities across jurisdictional boundaries, seeks to provide support through technical assistance and volunteerism opportunities, provides a clearinghouse of available data for communities to share and utilize in making smart development decisions into the future, and streamlines the process for MIDURN communities to access CDBG-NDR funding to complete projects that will address unmet recovery needs in their areas.

If awarded, these funds will assist the state in augmenting existing activities aimed at helping communities become more resilient. The state encourages all cities, towns and counties to adopt comprehensive growth policies; these policy documents serve as the foundation for how a community seeks to grow in the future, and identifies policy tools and actions necessary to fulfill that vision. The Department of Commerce presently supports the development of these documents through various grant programs including CDBG, and promotes disaster preparedness and coordination with the development of this and other long-range planning documents and related regulations. The Community Technical Assistance Program, housed within Commerce, provides technical support and professional guidance on the development of these documents and coordination with other planning and policy measure across Departments. The Disaster and Emergency Services Division at Military Affairs funds Pre-disaster Mitigation Plans which assist communities in identifying areas at risk and developing policies and solutions to address these risks in advance of a disaster occurring. Projects that have been completed as a result of some of these PDM plans include seismic stability at the creative art's complex at Montana State University in Bozeman; the completion of fuel reduction projects along the flume for the city of Helena's watershed; the creation of all-hazard flip charts for schools to include in their

emergency operations plans; as well as additional public education and outreach campaigns. Planning projects PDM plans as well as flood studys. The Department of Natural Resources and Conservation assists communities in the development, update and implementation of floodplain regulations which influence and are influenced by the growth policy and disaster mitigation planning documents (among others) developed by the local jurisdiction.

The state intends to utilize CDBG-NDR funds to assist not only with the implementation of key projects identified in the comprehensive resiliency project list discussed in the paragraphs above, in MIDURN communities identified in [section/page reference to checklist], but to develop the interactive web platform that will serve as the communication portal for communities statewide to implement resilient solutions in their areas. The state envisions this idea will serve as a long-term solution to addressing resiliency statewide, and intends to maintain the web platform beyond the lifetime of the grant itself. The solutions developed in response to unmet recovery needs – the key project list – will focus on permanent results as opposed to temporary solutions in response to those unmet needs. Comprehensive planning measures and innovative policy will be prioritized as part of this effort, to ensure that any project or implementation measure a community seeks funding for is supported by and in line with the community's long-term planning goals. In doing so, the effectiveness of the overall project and feasibility for its long-term success will be enhanced because the community has identified the project as a priority and is therefore committed to its funding and implementation. While no solution is truly permanent, this approach ensures community support for resilient measures from the ground up.

There will be definitive co-benefits resulting from the implementation of this idea, in that the comprehensive resiliency project list that will be the focus of the interactive web portal will have broad influence and cross-cut a variety of factors. For example, should development of a property acquisition program be included on the resiliency project list, the benefits gained by a community that would implement such a project would be vast. There would be environmental benefits gained from removing structures – residential or commercial – from an area prone to repeat flooding, returning land to its natural state and potentially becoming a community asset. The public health benefits gained in the relocation of property owners into structures less inclined to flood – and vulnerable to public health risks such as mold and structural damage – would be significant. And the financial benefits afforded to property owners that participate in voluntary acquisition and relocation would have an economic impact on the community as a whole – businesses prone to flooding would be relocated to areas where they would no longer be impacted by these events and able to operate on an unobstructed schedule. Homeowners would no longer be at the mercy of flood or fire events that would cause them to miss work and have an impact on business operations. The cost of remediation for individual property owners following a flood or fire event would no longer be a factor. The benefits associated with one project, selected by a community, would be far-reaching; only projects that have these comprehensive influences would be considered as part of the resiliency project list to promote best practices.

Through the implementation of the state's approach, residents and small businesses most vulnerable to future threats and hazards will have an opportunity to be part of the solution. The state's interactive web platform will be accessible to all; while many of the grant and loan opportunities will be geared toward local government applicants, private funding sources, technical assistance opportunities and the sharing of data, resources, information and ideas can be utilized by any member of the public wishing to build resiliency in their daily lives. Should a local government apply to implement one of the resilient project solutions listed on the site,

leveraging funding or technical assistance resources compiled, the intent would be for the long-term impact of those projects to have a lasting effect on the community as a whole, therefore benefiting those constituents who may be least resilient in the process. The state has struggled with how best to deal with the ramifications of climate change, although a Climate Change Action Plan has been adopted and specific goals and policy measures are discussed below.

The state will work directly with the MIDURN "pilot" community partners throughout the development of Phase 2, to determine best practice resiliency projects to be implemented should the state receive NDR funding. While only the MIDURN communities identified will have access to NDR funding for implementation, these "pilot" projects are intended to serve as examples that can be implemented in communities statewide, using other funding streams. So although the limited application of NDR funding may be seen as a negative, the intended outcome – to promote resilient best practices statewide and link communities to all possible funding sources - will be positive for adjacent areas and communities. The state will work with identified partners including the Montana-League of Cities and Towns, Montana Association of Counties, industry groups such as the Treasure State Resource Industry Association, Contractor's Association, Builders Association and others to promote implementation of resilient projects in communities statewide – to increase to positive impact of the grant award.

Local jurisdictions in Montana experience significant interdependence between key industry sectors such as housing, transportation, energy and the environment – and also rely on one another for information sharing and expertise when tackling issues and address projects in these respective industry sectors. When considering housing options, access to and capacity of the transportation network, presence of environmental constraints, and availability of economic opportunities as well as energy resources always factor into the conversation. Montana is a

predominantly rural state, and because of the geographic separation between communities – especially those identified as meeting the MIDURN thresholds - opportunities to coordinate resources are frequently sought. In light of this, the state will encourage MIDURN communities and communities statewide to coordinate regionally, with housing and economic development authorities, community development organizations serving a larger regional or tribal population, state agencies such as the Montana Department of Transportation and DES on issues related to regional transportation, among others, to assist in the implementation of selected projects from the comprehensive resiliency list. The state will also solicit assistance from partners in the public and private sector, including architects and engineering firms, professional planning consultants, conservation corps and Americorps employees to focus on capacity building and project implementation (construction, demolition, etc.), financial institutions, insurance agencies, economic developers, and more to assist communities in the execution of their selected projects. Many of these entities have been involved since the meeting in December, and have expressed interest or submitted partnership letters to demonstrate their intent to cooperate throughout the course of this process. Please refer to signed partnership letters attached in Attachment C documenting support of this Phase 1 application.

It is not anticipated that any jurisdiction would be able to present the state from addressing risks and vulnerabilities proposed by our approach. The way the approach has been presented, it is entirely the local jurisdiction's choice as to whether to participate in the process or not; however, the state will take measures to promote resilient solutions statewide, regardless of whether a community chooses to participate in the website platform and utilize the resources provided. There are existing mechanisms in place for coordination statewide, particularly between local, tribal, state and federal jurisdictions. Regulatory agencies often create working

groups to discuss common interests in projects, like the development of an Interagency Review Team for consideration of transportation corridors and other projects.

The target areas identified in the threshold narrative [page x] all participate in the the National Flood Insurance Program (NFIP) Community Rating System. The Rocky Boy Indian Reservation which is home to the Chippewa Cree tribe of Montana was impacted by a significant flooding event in 2011, but because it does not participate in the NFIP Community Rating System, a baseline windshield survey was not conducted following this event. The state continues to work with representatives from Rocky Boy and regional community development organizations such as OpportunityLink, to assist Rocky Boy in meeting the MIDURN threshold requirements to become eligible for NDR funding however, this may not occur until Phase 2 of the application process. Other target areas that presently do not meet all threshold requirements but that are currently working to document their efforts in hopes of becoming eligible for CDBG-NDR funds will be assessed for the NFIP status at the time of the state's Phase 2 application submittal. The state is unaware of participation in other state, regional, national, or international programs rating overall community commitment to resilience. However, individual resources like drinking water facilities are required to address risks to their supplies and with help from the DEQ can identify those risks. Federally required risk management plans (like those required in the federal Clean Air Act) and industry-standard based risk assessments take into account impacts on communities.

Montana communities, and the state as a whole, want to be resilient. Resiliency is seen as both fiscally responsible and promoting a spirit of independence, both qualities that resonate with Montana residents. Embracing the complexities and interconnectedness of long-range planning has often been a stumbling block when it comes to approaching resiliency at the local

level, to date. This, coupled with lacking coordination and redundant efforts between state agencies, local governments, non-profits, advocacy groups, industry leaders and regional organizations, to name a few, have resulted in piecemeal resiliency planning at both the local and state level. Should the state receive NDR funding, it is the intent that these funds not only support resilient solutions in MIDURN communities, but also serve as the catalyst to unite the innumerable resiliency efforts into one coordinated approach.

The inevitability of impacts related to climate change makes a unified approach to resiliency even more important. Montana created a Climate Change Action Plan in December 1999; however, no actual action from the plan occurred. In 2005, Governor Brian Schweitzer directed MDEQ to establish a Climate Change Advisory Committee (CCAC). Under this initiative, the CCAC evaluated opportunities to reduce greenhouse gas emissions in various sectors of Montana's economy while taking into consideration the Governor's charge to develop policy recommendations to "save money, conserve energy, and bolster the Montana economy." The result of this effort was the final Climate Change Action Plan Report, completed by CCAC in 2007. The report presents detailed cross-cutting policy measures intended to reduce emissions and educate the public in these efforts. However, the plan stops short of broadening the scope of the climate change response to look at adaptation beyond emissions reduction. Currently, the Air Resources Program at DEQ is working toward carbon reduction via a new effort/initiative.

## FACTOR 4 – PHASE 1: OUTCOMES AND LEVERAGE

The state of Montana intends for the proposed approach – and resulting project solutions – to serve as long-term responses to address resiliency in both the MIDURN communities identified in the threshold narrative [page #] as well as statewide. In taking a proactive and

collaborative approach toward addressing resiliency – responding to unmet need while seeking to emulate this response in communities across Montana - projects will focus on lasting solutions supported by long-range planning at the community level. This ensures local buy-in and the overall success of the projects to be implemented.

As previously discussed in the state's response to Factor 3 [page x], the approach Montana intends to take is two-tiered. The initial up-front effort that will go in to the first phase of our proposed project - the development of the interactive web platform - will be significant. Procuring the right firm(s) to assist in the technological framework itself, the gathering of information, engaging local governments, state departments, private and non-profit business and coordinating volunteers and providers of technical assistance will require substantial resources, time and commitment. As the web platform is undergoing development, direct assistance to those MIDURN communities identified will be ongoing, to implement activities selected from the comprehensive resiliency project list developed in collaboration with our partners during Phase 2. These projects, once developed, may include construction activities or capacity building in MIDURN communities that will be completed in phases, and may include a significant commitment of time and resources from the state and our partners. Other projects that may be developed as part of the comprehensive resiliency project list will be less consuming in their impact on time and resources over the long term – these project might include property acquisition, coordination on plan implementation through regulation and policy development, infrastructure improvements to encourage long-term mitigation and flood or fire prevention, for example.

Along these lines, infrastructure solutions including but not limited to green infrastructure

– especially those solutions that focus on native Montana plant species and the utilization of

existing resources to address unmet recovery needs and increase resiliency - will be considered as part of the comprehensive resiliency project list. As discussed in response to Factor 3 [page #1, projects developed and included on the comprehensive list will support best practices and promote outcomes that cross-cut topic areas such as housing, transportation, economy, environment and public health, and support co-benefits for the communities that choose to implement them. Montana's natural resources are both a source of pride and of economic benefit to the residents in this state; by using these resources in the promotion and implementation of resilient strategies, MIDURN communities and their counterparts will promote a value-added approach to resilient solutions, respecting the natural environment while capitalizing on the resources our state has readily available. By encouraging best-practices in green infrastructure, where most appropriate, this approach is both environmentally and financially sustainable. MIDURN communities and the state as a whole preserve the overall aesthetic that drives tourism, promotes business relocation and investment, and sustains the lifestyle Montana Using natural construction materials readily available in-state or in the residents desire. surrounding region reduces transportation and overhead cost.

Aging, outdated and in some cases non-existent infrastructure in Montana communities remains a significant barrier to coordination and continued resiliency statewide. In many of the MIDURN communities identified in the threshold narrative [page #], infrastructure needs have been compounded following a flooding or fire disaster. While unmet needs in the MIDURN communities identified range from housing to infrastructure to environmental degradation, investment in infrastructure improvements — beyond just water and wastewater — benefit the overall resiliency of these affected areas and the surrounding communities, and benefit the state on multiple levels. Without infrastructure capacity, communities struggle to grow — or recover,

and business cannot thrive. Water and wastewater infrastructure allow growth and recovery to occur; safe roads, bridges and pedestrian infrastructure promote physical access, while expansion to broadband networks and investment in technology upgrades improve communication, coordination and the potential for communities to market their resiliency and gain economic benefits. Combined, infrastructure investment promotes holistic recovery while supporting a certain level of awareness of risk, and preparation for, future disasters when they occur. When communities are self-aware and have taken measures to be self-sufficient in their resiliency efforts, the state as a whole benefits economically from the preparedness of those communities in the event of a disaster.

The intent of the state's application and use of the CDBG-NDR grant funds, if awarded, is to comprehensively and collaboratively address our primary vulnerability – barriers to communication. The tiered approach the state intends to take in responding to this vulnerability, as discussed in the response to Factor 3 [page #], will provide opportunities to engage our partners and the MIDURN communities in the identification of community assets and steps necessary to support meaningful economic revitalization. Through the development of the interactive web platform, communities statewide will have the ability to interface with one another, sharing information and ideas in the face of, and in response to, disaster. The platform will also serve as a one-stop shop in accessing and applying for grant funding, as well as soliciting investment through private and non-profit partnerships. Technical assistance resources, volunteer networks, partners in fields including architecture, engineering, planning, conservation and technology will be available and accessible directly from the website. Section 3 and DBE residents and business owners will have the opportunity to access, advertise and coordinate directly with local government entities wishing to develop a successful project,

leverage funding sources and receive technical assistance. Activities to be included in the comprehensive resiliency project list will be developed in coordination with our partners statewide, including regional economic development agencies, to ensure measures to promote and support comprehensive economic revitalization are incorporated within the overarching project goals for MIDURN communities specifically, but all Montana communities utilizing the web platform.

Gauging the success of the state's proposed approach will be done in a variety of ways. First, success will be measured by the number of local governments that actively participate in the interactive web platform will be a key factor; the state will strive for 60% participation within the first year, focusing on the MIDURN communities, tribal governments and those county and sub-county areas that have experienced multiple disasters receiving presidential declarations in 2011, 2012 and 2013. In the 2<sup>nd</sup> year of its implementation, the state hopes for 80% participation rate on the web portal, with 100% participation the target for success by 2019. Concurrently, the success of project implementation for MIDURN communities will be measured by the type of project(s) selected and how those projects are supported by the community's existing planning efforts, the overall impact the project will have on long-term resiliency, the type and amount of resources leveraged beyond just CDBG-NDR funds, and the timeline from start to finish (project dependent). Specific evaluation factors will be fleshed out more comprehensively during Phase 2 of the state's application, specific to the project types as they are further developed in collaboration with our partners.

The state has been working directly in partnership with the local governments identified as meeting the MIDURN threshold requirements, to assess their readiness, willingness, and capacity to implement resiliency measures through project activities that will address unmet

need. Partner letters from each of the communities meeting the MIDURN threshold requirements have been included as part of this application package [reference attachment location/page #]. In the state's estimation, it is imperative that the local governments having jurisdiction in the MIDURN areas identified have the capacity – or a plan in place to develop capacity – not only to implement the intended project(s) activities but are committed to the long term maintenance and resiliency measures that go hand-in hand with implementation, should funding be received.

Additionally, the state has been actively engaging with a broad network of partners who, if funded, are committed to participate in the development of the interactive web platform, provide technical assistance, professional services or leveraging funds, assist MIDURN communities in the implementation of resilient solutions to address unmet need utilizing CDBG-NDR funds, as well as assist communities statewide in implement resilient solutions using a combination of existing grant dollars, leveraged resources, volunteerism and expertise. At this time confirmed partners include a variety of public, private, local and regional entities:

- OpportunityLink (serving north Central Montana Communities
- Helena Valley Disaster Response Team
- Montana Conservation Corps
- The Disaster Preparedness Assistance Center
- Fergus County Commissioners
- Fergus County Disaster & Emergency Services
- Fort Belknap Tribe
- Snowy Mountain Development Corporation
- Great West Engineers

- Crow Disaster and Emergency Services
- Crow Agency Housing Office

The state will continue to develop this broad network of partners throughout the Phase 2 application process. In doing so, the state will seek to partner with insurance representatives including the Montana Municipal Interlocal Authority (MMIA), a statewide organization that supports local communities through risk management and offers coverage for Property and Liability to municipalities. Additionally, the state will partner with the Montana Association of County Governments (MACO), an organization providing similar insurance and liability coverage for local county governments in Montana. These partnerships and others will be easier to flesh out once we begin to work MIDURN communities, agencies and professional partners on developing the comprehensive resiliency project list.

It is the goal of the state's approach at this time to promote resilient project development that seeks to eliminate or mitigate risk factors related to disasters. As previously discussed, this may include property acquisition and relocation programs, economic revitalization measures, expansion of infrastructure including broadband, improvements to public infrastructure such as water or roads and incorporation of natural materials and green infrastructure in mitigation measures such as bank stabilization. Once developed, the intent of the comprehensive resiliency project list is not only to encourage best practices in resiliency in MIDURN communities but also statewide. By focusing heavily on planning for future disasters and mitigating risk factors, the state hopes to attract support from lending institutions, insurance agencies, and private partners that experience the greatest impact in the event of a disaster. One measure of resiliency is financial stability; if a community is proactive in their prevention and mitigation efforts before a disaster occurs, insurance claims, property damage, loss of productivity in business operations

and costs borne by taxpayers to repair or replace necessary infrastructure can be reduced. Reduction in immediate and long-term costs resulting from a disaster benefit the greater community but directly benefit those institutions involved in financing repairs to buildings and infrastructure, handling insurance claims and payouts, and sustaining employers and employees source of income when the business or industry for which they work is impacted or destroyed as a result of a disaster. The state will seek partnerships with key industry networks that would directly benefit from communities taking a proactive approach toward disaster resiliency, with the intent that these partnerships could lead to public and private financing options for the implementation of resiliency best practices, in MIDURN communities as well as statewide. By investing in proactive resiliency measures, utilizing resources and leveraging funding options accessible through the interactive platform that will be developed, the state hopes to incentivize resiliency at the local, regional and statewide level, to reduce expenditures and costs associated with property and job loss, environmental degradation and infrastructure repair.

The State of Montana administers a variety of public grant and loan funding options that communities may access to pay for community, economic and infrastructure development. We anticipate the state's approach to disaster resiliency will alter the way many of these public funding streams will be utilized and applied in the future, indefinitely. Because true resiliency requires a shift in approach to how communities grow, develop and react in the event of an emergency or disaster, the piecemeal application of funding sources is losing its effectiveness. Coordination of resources and funding opportunities through the interactive website platform will enable communities to better understand the interrelatedness of different funding streams, enabling them to build more comprehensive funding packages that include planning and capacity building as key components. Through continued outreach incorporated within the states overall

approach to disaster resiliency, communities seeking funding to develop comprehensive growth and capital improvement plans may pair those resources and improve the comprehensiveness of their approach by integrating disaster mitigation planning in these, and other, long range planning efforts. Providing a solid foundation for resiliency through planning will also impact how dollars are spent at the local level, to implement resiliency best practices. Funds allocated to address unmet need, through CDBG-NDR and other leveraged resources, will seek to promote long-term resilient solutions as opposed to simply fixing a problem without understanding and addressing the larger cause.

As discussed throughout this application but specific with regard to the state's approach outlined in Factor 3 [page #], the state intends to utilize the CDBG-NDR funding to create a framework that will address the overarching communication barriers felt statewide; we will seek to provide direct assistance to MIDURN communities identified through the implementation of activities, developed in conjunction with our partners, that promote resiliency best practices and address unmet needs in these communities. In doing so, and through the development of the interactive website platform, the success of these projects will serve as an example to jurisdictions of similar size and scale. Technical assistance leveraged resources will promote and support ongoing resiliency activities in jurisdictions across the state. The partnerships presently established and those we will seek to develop throughout the course of Phase 2 of this application process will provide springboards to communicate statewide the importance of resiliency and use of the interactive platform to their constitutents. Many of our partners are regional groups that have reach beyond the MIDURN communities that are a focus of this application. The intent of the approach is to support resiliency across all facets of local and state

government, through proactive planning and implementation of projects that planning supports in cities, towns, counties and regions throughout Montana.

At this time, the state of Montana has not established firm monetary commitments from other sources or partners identified, but will seek to develop this during Phase 2 of the application process. Because we have not fully developed projects or activities specifically addressing unmet need in our MIDURN communities, the state did not seek financial commitments at this stage of the process.

## FACTOR 5 – PHASE I: REGIONAL COORDINATION AND LONG-TERM COMMITMENT

The introduction of the NOFA and the state's ensuing coordination has resulted in a significant amount of collaboration and information sharing among state agencies the past five months. Should the state not receive CDBG-NDR funding, the lines of communication that have been opened as part of this application process will most certainly lead to additional coordination and implementation of resilient strategies at the state level, through various funding and technical assistance programs. As previously discussed in Factor 3 [page #], the Department of Commerce offers a variety of grant, loan and technical assistance options to assist with community and economic development, that overlap with grant, loan and technical assistance options offered through other state agencies including DEQ, DES and DNRC.

Grant and loan assistance between agencies is frequently paired to fund infrastructure development statewide, or respond to emergency infrastructure situations; for instance, the Treasure State Endowment Program (known as TSEP) is a state-funded program within Commerce's Community Development Division that has been designed to help address infrastructure affordability by providing grants to lower the cost of constructing public facilities

projects. Applicants applying for TSEP funding typically leverage grant funds by applying to the Renewable Resources Grant and Loan program administered by the DNRC's Resource Development Bureau, or utilize low interest loans through the State Board of Investment. Additional grant and loan funds to improve infrastructure utilized frequently as part of the overall funding package are available through the State Revolving Fund administered by the DEQ's Planning, Prevention and Assistance Division. Federal funding through USDA's Rural Development program along with HUD funding for CDBG public infrastructure projects is also often leveraged for these types of projects. The DES provides grant funding for mitigation grants that can serves as match the CDBG grants [HMGP, PDM and FMA grants, for example]. The existing collaboration through the TSEP program, among others, will continue even if NDR funding is not awarded to the State of Montana; however, the importance of seeking resilient solutions in communities will be further explored, and the relationships that exist between agencies and Divisions broadened, to direct existing local, state and federal funding sources toward solutions that will promote resiliency.

One way this will be accomplished is through proactive planning and coordinating existing grant resources and technical assistance to promote resiliency at the local level. Existing planning grant funding offered through the Department of Commerce – through TSEP, CDBG, and other community development oriented programs – provide resources for communities to complete growth policies, comprehensive capital improvement plans, downtown master plans and regional comprehensive economic development strategies – all of which can and should look at resiliency in the event of disaster and prioritize policy and project implementation that will assist a community in responding to, or preventing significant impacts resulting from such an event. The Department of Emergency Services also offers funding to assist communities in the

development and update to disaster mitigation plans; communities seeking funding to complete these long range plans or develop policy as a result will benefit from coordination between DOC and DES and staff's professional expertise moving forward, through technical assistance that identifies the parallels between these and other planning efforts, and how a growth policy or mitigation plan should address resiliency consistently. Technical assistance options offered through the DOC's Community Technical Assistance Program, paired with assistance provided by DNRC's Water Resource Division staff on the development and implementation of floodplain regulations, will benefit from similar coordination and guidance on the interrelatedness of these planning documents and regulations.

Beyond the continued coordination described above, the state is committed to improving resiliency regardless of whether NDR funding is awarded. To demonstrate this commitment, the state has taken or intends to take the following steps toward resiliency through legislative action, raising standards and improving resiliency through proactive planning.

Legislative actions: The State of Montana 2015 Legislative Session is currently underway, and resiliency has been the focus of policy discussion. On February 17<sup>th</sup>, 2015, Governor Steve Bullock signed into law Senate Bill, 5, an act providing for the establishment of and funding for deployment of all-hazard incident management assistance teams in the event of a disaster or emergency. The law also provides for expenditure authority to pay for these teams and the development of procedures related to emergency response actions to be carried out by team members [a copy of the signed legislation has been uploaded to the Drop Box site available through the following link]. This legislation commits state funds and resources to quickly and effectively respond to a disaster, providing local incident management teams whose purpose is to mitigate the impacts of an incident prior to a disaster or emergency declaration. Given recent

incidents involving oil spills from pipeline into the Yellowstone River, threatening the natural environment as well as drinking water sources, this legislation seeks to respond to the emerging threat of disaster resulting from infrastructure failure. As this legislation is now present law, the Governor will have authority to deploy all-hazard incident management teams to any area within the state experiencing a locally declared disaster moving forward, and especially as we enter the spring thaw and flooding season.

Raising standards: Incorporated cities, towns and counties in the state of Montana are required to develop and adopt subdivision regulations, in compliance with state statue and following the locally adopted growth policy, to regulate development within their jurisdictions. The Department of Commerce's Community Technical Assistance Program is currently working on an update to 2006 model subdivision regulations, to be introduced in the summer of 2015; the model incorporates standards and best practices specific to development occurring within floodplain, wildland urban interface (WUI) and therefore more susceptible to fire, areas prone to earthquakes and soil liquefaction of soils, among other natural hazards. CTAP will seek to incorporate best practices and guidance provided by the DEQ and DNRC (and other state agencies) in the development of this model, specifically related to fire and flood mitigation. Once introduced, cities, towns and counties may voluntarily update their existing regulations to reflect the model document; the state will provide direct technical assistance in helping communities understand the best practice recommendations (that go above and beyond what may be statutorily required), and assist in the update and adoption process to encourage implementation – especially in those MIDURN communities identified, predominantly located in the eastern half of the state. The updated Model Subdivision Document is anticipated to be made available to communities for implementation by July of 2015. Given the current level of interest from communities wishing to update their regulations, the state projects direct assistance will be provided for 10 communities in the northeast, southeast and central part of the state during the first 6 months of the model's introduction.

Resilience actions related to plan updates or alignment: As previously stated, agency representatives at DES, DEQ, DNRC and Commerce will provide technical assistance to local jurisdictions within to develop or update their growth policies and/or hazard mitigation plans, to ensure these documents coordinate on vision, policy and implementation, to reflect the overarching goals of the community when evaluating risk and proposing resiliency measures. This change in approach will take place immediately, and be integrated in each agency's approach to the award of funding to complete long-range plans. If successful, and over time, this commitment will have an impact on nearly every resident in the state of Montana, as 54 out of 56 counties have adopted growth policies and 47 counties have adopted hazard mitigation plans. This coordination would mark a sea-change in the way Montanans approach growth and development within their communities, promoting informed decision-making related to flood and fire risk, encouraging mitigation and/or limiting development and density prior to a disaster occurring instead of simply reacting to the event. This simple action will have a significant impact on local and statewide resiliency in Montana, and is something that can and should occur regardless of whether NDR funds are awarded.